

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	No. 13 CR 328
)	
ABDELLA AHMAD TOUNISI)	Hon. Samuel Der-Yeghiayan

**MOTION FOR ENTRY OF AGREED
PROTECTIVE ORDER GOVERNING DISCOVERY**

Pursuant to Fed. R. Crim. P. 16(d) and 18 U.S.C. § 3771(a), the United States of America, by GARY S. SHAPIRO, United States Attorney for the Northern District of Illinois, moves for the entry of an agreed protective order, and in support thereof states as follows:

1. This is a criminal matter in which the grand jury has returned an indictment charging the defendant with providing material support to a designated foreign terrorist organization, in violation of Title 18, United States Code, Section 2339B(a)(1), and with making false statements to a federal officer in a matter involving international terrorism, in violation of Title 18, United States Code, Section 1001(a)(2).

2. The discovery to be provided by the government in this case includes sensitive information, whose unrestricted dissemination could adversely affect national security, law enforcement interests, and the privacy interests of third parties.

3. The government has discussed the proposed protective order with counsel for defendant, who agrees to the entry of the proposed order.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted,

GARY S. SHAPIRO
United States Attorney

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